

REMARKS

This Response addresses the issues raised by the Examiner in the Office Action mailed February 9, 2006. Initially, Applicants would like to thank the Examiner for the careful consideration given this case and for the indication of allowable subject matter. Initially, Applicants would like to thank the Examiner for the careful consideration given this case and for indicating that the previous rejections have been withdrawn. In view of the following remarks, Applicants believe that all outstanding issues have been addressed and that each and every remaining claim (Claims 1, 3, 6, 9 and 10) are in condition for final allowance. Prompt notice to such effect is respectfully requested.

The Present Invention and the Cited References

The Examiner rejected Claims 1, 3, 6, 9 and 10 under 35 U.S.C. 103(a) as being unpatentable over by U.S. Patent No. 6,331,984 to Luciani ("Luciani") in view of U.S. Patent No. 6,434,627 to Millet et al. ("Millet"). Respectfully, Applicants believe that the Examiner has read limitations into the disclosures of these references and has otherwise mischaracterized the teachings of this prior art. Given the actual scope of these patents, it is clear that the present claims are distinguishable.

The present invention, as claimed, is characterized as a combination of: (1) a translator for translating a destination address of a packet from a mobile terminal (e.g., the address of a correspondent terminal of the mobile terminal); (2) a translation server which acquires translation information from said translator and registers the acquired translation information therein; and (3) another translator at a location after movement of the mobile terminal which acquires said translation information from said translation server after the mobile terminal has been moved. With this claimed combination of features, the present invention provides an unexpected advantage that the mobile terminal need not make an address query after the mobile terminal has been moved.

The two cited patents do not teach this combination of elements either alone or in combination with each other. For example, Luciani, at col. 5, lines 13-33, discloses that within a single domain, two switches or routers (130 and 140) serve as a server and a client to each other to request and acquire address translation information of terminals within the domain. Similarly, Millet, at col. 6, lines 22-32, discloses that when a terminal has moved to a remote network that is different from a home network, an address translator within the

remote network acquires an address unique to the terminal and held by the terminal to generate address translation information of said terminal.

Therefore, when comparing the present claims to Luciani, the two switches/routers in Luciani clearly serve as a server and a client to each other in order to exchange address translation information. However, these disclosed elements are nothing but switches or routers, and they can communicate only within a single (one) domain. As described in col. 6, lines 29-30, these routers must be located within one domain. In short, the two switches (or routers) cannot accommodate a mobile terminal which moves between domains as claimed in the present invention. Thus, Luciani discloses a system configuration which is entirely different from Applicants' system configuration comprising: (1) a translator at a location before moving of a mobile terminal; (2) a translation server; and (3) another translator at a location after moving the mobile terminal.

When comparing the present claims to Millet, the address translator in Millet clearly is in a destined network with which a mobile terminal has moved. However, the address translator thus destined generates address information within itself. In addition, when generating the address information, the mobile terminal must acquire address information of the mobile terminal by itself. See Millet at col. 9, lines 11-20. Thus, Millet discloses a system configuration which is entirely different from Applicants' system comprising: (1) a translator for translating an address of a party to be communicated with a mobile terminal before moving of the mobile terminal; (2) a translation server which registers the translation information therein; and (3) another translator at a location after movement of the mobile terminal which acquires said translation information from said translation server.

Combining the Two Cited References

Any combination of Luciani and Millet likewise does not teach or suggest the presently claimed invention. Luciani discloses the exchange of translation information only within a single (one) domain. As stated above, the specification of Luciani in fact requires that the two routers (switches) exist within one domain. Millet discloses an address translator for a terminal which moves between a plurality of networks. Thus, these references fundamentally teach away from each other in their core technical concept. The Examiner has set forth no teaching or suggestion in either reference to establish a proper prima facie case of obviousness (because the references actually teach away from each other). The Examiner merely makes a bald statement that "one would be motivated to [combine] in order to allow

individuals to access the Internet when they are traveling” – a statement that is not only superficially an improper rationale upon which to base a §103 combination, but one which also does not address any relevant technological point within either reference. Therefore, there is no technical significance to the combination of these two pieces of art, and it is not proper to combine Luciani and Millet.

However, although Applicants have shown that it is improper to combine Luciani and Millet as stated above, even if such a combination is improperly presumed, such a combination still does not set forth each and every element of the claimed invention. Specifically, even if the switch (or router) of Luciani were applied to Millet’s networks for a mobile terminal, Luciani’s switch (or router) could not communicate with a translation server according to the invention. Luciani’s method is fundamentally different from the present invention’s address translator and other address translator because the Luciani switch (or router) cannot communicate with “another” network (and therefore an additional address translator). Conversely, even if Millet’s address translator were applied to Luciani’s system, the translator could not acquire address translation information from a translation server as with the use of the present invention’s other translator, because Millet’s address translator generates address translation information by itself and performs the generation of address translation information based on address information acquired from a terminal.

Therefore, although no proper motivation to combine these references has been asserted by the Examiner, even if Luciani and Millet are combined, the presently claimed invention would not be obvious as it features a translation server which can communicate with both a translator before movement of a mobile terminal and another translator at a location to which the mobile terminal has moved, wherein the other translator acquires address translation information from the translation server after movement of the terminal. These integrated limitations are simply not met by any combination of Luciani and/or Millet.

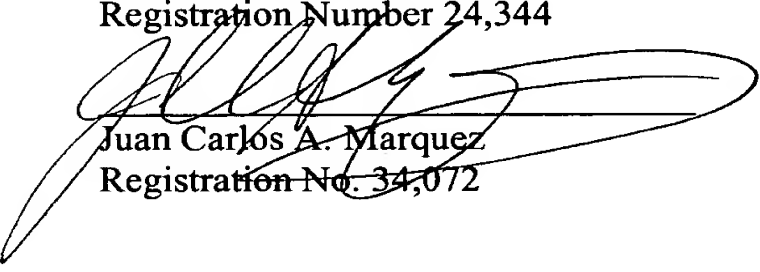
Conclusion

The above remarks address each and every concern raised by the Examiner in the Office Action. Applicants believe that all remaining claims of the present invention are now

in condition for final allowance. If the Examiner feels that any issues remain outstanding, the Examiner is encouraged to contact Applicants' attorney at the contact information below.

Respectfully submitted,

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